

1 KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
2 (tkeller@kbkllp.com)
Peter J. Benvenutti (#60566)
3 (pbenvenutti@kbkllp.com)
Jane Kim (#298192)
4 (jkim@kbkllp.com)
650 California Street, Suite 1900
5 San Francisco, CA 94108
Tel: 415 496 6723
6 Fax: 650 636 9251

7 *Attorneys for Debtors and Reorganized Debtors*

8
9 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
10 **SAN FRANCISCO DIVISION**

11
12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
20 ☒ Affects both Debtors

21 ** All papers shall be filed in the Lead Case, No.*
22 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

DECLARATION OF A. ANNA CAPELLE IN
SUPPORT OF MOTION TO REDACT
DOCUMENTS FILED IN SUPPORT OF
REORGANIZED DEBTORS' OMNIBUS
OBJECTIONS TO CLAIMS

[No Hearing Requested]

1 I, A. Anna Capelle, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as a Managing Counsel, Litigation and Commercial Contracts, in the Law
5 Department of Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E
6 Corporation (“**PG&E Corp.**”) and together with Utility, the “**Reorganized Debtors**” in the above-
7 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I have been employed in this role since May 1,
8 2020, and prior to such date I was employed as Interim Managing Counsel, Strategy and Policy. I have
9 been employed as an attorney for PG&E since October 2006. In my current role, I am responsible for
10 supervising seven litigation attorneys, and advising leaders on litigation and general dispute issues. I
11 also regularly consult with my colleagues elsewhere in the Utility’s Law Department on legal issues that
12 cover a variety of other subject matter. I submit this Declaration in support of the *Motion to Redact*
13 *Documents Filed in Support of Reorganized Debtors’ Omnibus Objections to Claims* (the “**Motion**”),¹
14 filed contemporaneously herewith.

15 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
16 my personal knowledge, the knowledge of other Utility personnel working under and alongside me on
17 this matter, my discussions with PG&E’s professionals and various other advisors and counsel, and my
18 review of relevant documents and information. If called upon to testify, I would testify competently to
19 the facts set forth in this Declaration. I am authorized to submit this declaration on behalf of the
20 Reorganized Debtors.

21 3. **Exhibit 1** to the Books and Records Objection, **Exhibit 1B** and **Exhibit 2B** to the No
22 Legal Liability Objection, and **Exhibit 1** to the Plan Passthrough Objection (collectively, the “**Redacted**
23 **Exhibits**”) each contains the names, contact information, and Claim numbers (collectively, the
24 “**Personal Information**”) for a number of current and former employees of the Reorganized Debtors
25 (the “**Redacted Claimants**”) who have pending Claims, many of which are directly connected with their
26 prior or current employment with the Reorganized Debtors.

27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Motion.

4. The Reorganized Debtors have made a commitment to their employees to keep their information confidential. The Reorganized Debtors want to avoid providing contact information for their employees lest that information be used by members of the public to initiate unwanted contact. Furthermore, such information could be used, among other things, to perpetrate identity theft or to locate survivors of domestic violence, harassment, or stalking.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief. Executed this fifteenth day of June, 2021.

/s/ A. Anna Capelle
A. Anna Capelle